

SUPERIOR COURT OF THE STATE OF WASHINGTON
FOR PIERCE COUNTY

K.H.,

Plaintiff,

v.

STATE OF WASHINGTON DEPARTMENT
OF SOCIAL AND HEALTH SERVICES,

Defendant.

NO. 17-2-13890-3
STIPULATED JUDGMENT

Judgment Summary (RCW 4.64.030)

Judgment Creditor: Keywanna Hardiman (K.H.)
Judgment Creditor' Attorneys: Michael T. Pfau and Vincent T. Nappo
Judgment Debtor: State of Washington
Judgment Amount: \$1,700,000.00
Pre-Judgment Interest: \$0
Post-Judgment Interest: \$0
Taxable Costs and Attorneys' Fees: \$0

THIS MATTER having come on regularly before the undersigned judge of the above-entitled Court; and the Plaintiff, K.H., acting by and through Michael Pfau and Vincent Nappo,

1 and the Defendant, State of Washington, Department of Children, Youth, and Families¹ acting
2 by and through Robert W. Ferguson, Attorney General, and Jonathan E. Pitel, Assistant Attorney
3 General; and these parties having made a stipulation pursuant to RCW 4.92.150, without any
4 admissions of liability, settling and compromising this action against the Defendant and allowing
5 for dismissal of this action with prejudice against the Defendant, and it appearing to the Court,
6 after a review of the files and records herein and statements of counsel in open court, that the
7 sum of One Million Seven Hundred Thousand and No/100 Dollars (\$1,700,000.00) is a proper
8 and just settlement to be paid by the Defendant, State of Washington, to the Plaintiff; and the
9 Court being fully advised, now, therefore,

10 **IT IS HEREBY ORDERED** That the Plaintiff, K.H., shall have judgment against the
11 the Defendant, State of Washington, Department of Children, Youth, and Families for the total
12 sum of One Million Seven Hundred Thousand and No/100 Dollars (\$1,700,000.00). Reasonable
13 fees and costs found by the court shall be deducted from these gross amounts. Additionally, any
14 liens, subrogated interests, or outstanding medical bills of which Plaintiff's counsel has actual or
15 constructive notice prior to court approval of this settlement shall be resolved out of these gross
16 amounts, and defendants shall have no liability for any such liens, interest, or bills.

17 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that neither party shall
18 recover against any other party their respective fees, costs, nor interest herein.

19 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that, pursuant to the
20 provisions of RCW 4.92.160, the Defendant, State of Washington, Department of Children,
21 Youth, and Families, shall pay to the clerk of the above-entitled Court the sum of One Million
22 Seven-Hundred Thousand Dollars (\$1,700,000.00) for the benefit of the Plaintiff herein and that
23 upon receipt of said sum the clerk thereof shall forthwith dismiss this case with prejudice, satisfy

24
25 ¹ Functions performed by the Children's Administration within the Department of Social and Health Services
26 (DSHS) were transferred, along with all liabilities, to the Department of Children, Youth, and Families (DCYF)
on July 1, 2018. Plaintiff has made no allegations of wrongdoing against any other agency or administration
within DSHS, and the parties intend that this release applies to all of Plaintiff's claimed injuries in this matter
against the State of Washington and any of its agencies.

1 the judgment against the State of Washington and shall hold such sum subject to the further order
2 of this Court.
3

4 DONE IN OPEN COURT this _____ day of May 2019.
5
6
7 HONORABLE G. HELEN WHITENER
8

9 *Approved as to Form and Notice of*
10 *Presentation Waived:*

11 ROBERT W. FERGUSON
12 Attorney General

13 
14 JONATHAN PITEL, WSBAA No. 47516
15 Attorney for Defendant

16 *Presented by:*

17 PFAU COCHRAN VERTETIS AMALA,
18 PLLC


19 VINCENT T. NAPPO, WSBAA No. 44191
20 Attorney for Plaintiff
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